

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION**

**IN RE:**

**MARTIN T. TAN  
Debtor**

**CHAPTER 11  
CASE NO. 07-16323**

**DEBTOR'S APPLICATION TO EMPLOY COUNSEL**

To the Honorable U.S. Bankruptcy Court:

With respect to this, the Debtor's Application to Employ Counsel, Martin T. Tan, (the "Debtor"), respectfully represents that:

1. The Debtor filed a Voluntary Petition under Chapter 11 of the Bankruptcy Code on October 4, 2007, on a pro-se basis. The Debtor has now selected Timothy M. Mauser, Esquire, and the Law Firm of Mauser & Mauser, 98 North Washington Street, Boston, Massachusetts as his counsel to represent him in said bankruptcy proceedings.
3. The Debtor has selected Timothy M. Mauser, Esquire, and the Law Firm of Mauser & Mauser, for the reason that they have had experience in bankruptcy proceedings.
4. To the best of the Debtor's knowledge, Timothy M. Mauser, Esquire, and the Law Firm of Mauser & Mauser, represents no other entity in connection with the handling of this Debtor's bankruptcy proceedings and that they hold no interest adverse to the interest of the Debtor with respect to these bankruptcy proceedings.

WHEREFORE, the Debtor prays that he be authorized to employ the said Timothy M. Mauser, Esquire, and the Law Firm of Mauser & Mauser as his counsel in these bankruptcy proceedings, under Chapter 11 of the Bankruptcy Code.



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Martin T. Tan

3371.01.wpd

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION**

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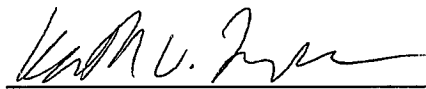
**AFFIDAVIT OF PROPOSED COUNSEL**

I, Timothy M. Mauser, hereby solemnly make oath that:

1. I am an attorney and counselor at law, duly admitted to practice in the Commonwealth of Massachusetts and in this Court.
2. I am a member of the law firm of Mauser & Mauser and maintain an office for the practice of law at 98 North Washington Street, Boston, Massachusetts 02114
3. Neither I nor any member of my firm holds or represents any interest adverse to the above-named Debtor.
4. Neither I nor any attorney affiliated with Mauser & Mauser has any connection with the above-named Debtor, his creditors, or any other party in interest herein, or their attorneys, except that Mauser & Mauser represents said Debtor in these bankruptcy proceedings. I am and each member of my firm is a "disinterested person", as the term is defined in 11 U.S.C. sec. 101(14).
6. I have not agreed to share with any person (except members of my firm) the compensation to be paid for the services rendered in this case.
7. To date I have received \$7,000.00 as a retainer in this matter from the Debtor's mother-in-law.

8. I shall amend this statement immediately upon my learning that (a) any of the within representations are incorrect or (b) there is any change of circumstances relating thereto.

9. I have reviewed the provisions of MLBR 2016-1.

  
Timothy M. Mauser, Esquire  
Notary Public: Katherine V. Forde  
My Commission Expires: 12/27/2013

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION**

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**ORDER AUTHORIZING EMPLOYMENT OF COUNSEL**

Upon consideration of the Application of the Debtor for authority to employ Timothy M. Mauser, Esq. and the Law Firm of Mauser & Mauser as counsel to represent him in proceedings with respect to legal matters arising pursuant to the Chapter 11 proceedings of the above-named Debtor, and it appearing that Timothy M. Mauser, is an attorney duly admitted to practice in this Court, and the Court being satisfied that he represents no interest adverse to said Debtor, which would affect his ability to properly represent the Debtor, it is:

ORDERED, that the Debtor be and hereby is, authorized to employ Timothy M. Mauser, Esq. and the Law Firm of Mauser & Mauser to represent him in all matters relating to legal matters arising pursuant to its Chapter 11 proceedings, and it is further

ORDERED, that the compensation will be subject to the last sentence in 11 U.S.C. sec. 328(a), and it is further

ORDERED, that compensation for the said Timothy M. Mauser and the Law Firm of Mauser & Mauser will be determined by the Bankruptcy Court.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2007.

\_\_\_\_\_  
U.S. Bankruptcy Judge

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
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**IN RE:**

**MARTIN T. TAN  
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**CERTIFICATE OF SERVICE**

I, Timothy M. Mauser, do hereby certify that I have this day served a copy of the enclosed Debtor's Application to Employ Counsel, Affidavit of Counsel, and proposed Order upon the following parties in interest to said action by serving a copy of the same, as indicated to:

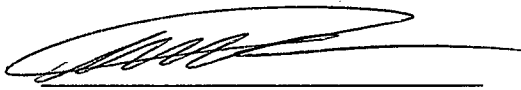
**By ECF:**

John Fitzgerald, Office of the United States Trustee, Boston, Massachusetts

**By Regular Mail:**

Martin T. Tan  
321 Commonwealth Avenue  
Newton, MA 02467

and the entities on the attached service list.



Timothy M. Mauser, Esq.  
Mauser & Mauser  
Suite 305  
98 North Washington Street  
Boston, MA 02114  
(617) 338-9080  
BBO# 542050

Dated: October 19, 2007  
3371.01.wpd

AAA Financial Services  
P.O. Box 15026  
Wilmington, DE 19850

Ace Gaming LLC The Sands  
Indiana & Brighton Pk  
Atlantic City, NJ 08401

American Express  
P.O. Box 740640  
Atlanta, GA 30374

Aspire Visa  
P.O. Box 105555  
Columbus, GA 31902

Bank of America  
P.O. Box 15026  
Wilmington, DE 19850

Beneficial HSBC Group  
422 Walpole Street  
Norwood, MA 02062

Boardwalk Regency Corp  
2100 Pacific Avenue  
Atlantic City, NJ 08401

Capital One Services, Inc.  
15000 Capital One Drive  
Richmond, VA 23238

Chase Card  
P.O. Box 15298  
Wilmington, DE 19850

Chisari, Salvatore  
104 Adams Avenue  
West Newton, MA 02465

Citi Card  
P.O. Box 6500  
Sioux Falls, SD 57117

Cristofori, Mark  
291 Watertown Street  
Newton, MA 02458

HSBC  
P.O. Box 81622  
Salinas, CA 93912

Levine, Jeffrey S.  
5 Nolan Farms  
Wayland, MA 01778

M.P.G.E. Foxwoods  
P.O. Box 3777 Route 2  
Mashantucket, CT 06338

MGM Grand Hotel, LLC  
3799 Las Vegas Blvd  
South Las Vegas, NV 89109

Marina District Dypt LLC  
One Borgata Way  
Atlantic City, NJ 08401

Newton-Wellesley Hospital  
2014 Washington St  
Newton, MA 02462

RBS  
P.O. Box 7092  
Bridgeport, CT 06601

RIH Acquisitions NJ, LLC  
Boston & The Boardwalk  
Atlantic City, NJ 08401

Sears Card  
P.O. Box 6922  
The Lakes, NV 88901

Sovereign Bank  
450 Penn Street  
Reading, PA 19602

Tennant, Walter  
1149 Washington St  
West Newton, MA 02465

Trump Taj Mahal Assoc.  
1000 Boardwalk  
Atlantic City, NJ 08401

Vecchio, Thomas J.  
22 Lory Drive  
Waltham, MA 02452

Watertown Savings Bank  
60 Main Street  
Watertown, MA 02472

Wells Fargo Financial  
P.O. Box 14433  
Des Moines, IA 50306

Wells Fargo Financial Massachusetts, Inc  
4137 121st st  
Urbandale, IA 50323



c/o Jay Bourgeois  
JJ Harwood Floors  
101 Clematis Avenue  
Waltham, MA 02451

Henry Bourgeois  
23 Cedar Hill Lane  
Waltham, MA 02452